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By Email and NYSCEF

July 8, 2020

Hon. Edgardo Ramos
United States District Court for the Southern District of New York
Thurgood Marshall U.S. Courthouse
40 Foley Square, Courtroom 619
New York, NY 10007

Re: *Gerald Green v. Capital One, N.A. and Square, Inc.*, Index No. 1:20-cv-04655

Dear Judge Ramos,

We represent Defendant Square, Inc. (“Square”) in the above-referenced action. With Plaintiff’s consent, Square respectfully submits its first request for an extension of time to answer or otherwise respond to the Complaint. Pursuant to Rule 6 of the Federal Rules of Civil Procedure and Rule 1(E) of Your Honor’s Individual Practices, Square states the following in support of its request:

1. Square was served with the Complaint on or about June 19, 2020.
2. Square’s current deadline to respond to the Complaint is July 10, 2020.
3. Plaintiff has consented to an extension of thirty-one (31) days for Square to respond to the Complaint, making Square’s response due August 10, 2020.
4. This is Square’s first request for an extension of time to answer or otherwise respond to the Complaint.
5. Square makes this request in order to allow its undersigned counsel to investigate the allegations in the Complaint and potential defenses thereto. The requested extension of time should allow the undersigned sufficient time to obtain and review the necessary documentation and to draft an appropriate response to the Complaint.

For the foregoing reasons, Square respectfully requests that the Court extend the time for Square to answer or otherwise respond to Plaintiff’s Complaint until August 10, 2020. We thank the Court for its consideration of this request.

Respectfully submitted,

/s/ Isaac B. Zaur